



# Used Oil Recycling

## EPA Revisits Used Oil Management Standards and Listing

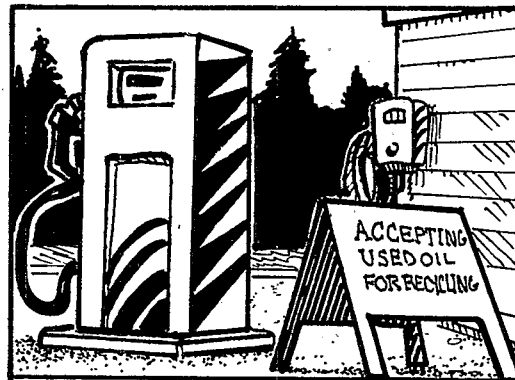
**T**he U.S. Environmental Protection Agency (EPA) is in the process of determining the most practical methods for managing used oil to protect human health and the environment while encouraging recycling of this valuable resource. Those who are involved in used oil management have been concerned about a possible change in the regulatory status of used oil from a nonhazardous to a hazardous waste. Hazardous wastes are stringently regulated under the Resource Conservation and Recovery Act (RCRA). Many fear that a hazardous waste designation would make it difficult to develop collection systems for Do-It-Yourselfer (DIY) used oil.

On September 23, 1991, EPA issued a notice in the *Federal Register* that requested comments on the latest data bearing on whether to add used oil to the list of wastes determined to be hazardous under RCRA. The notice also proposed alternative standards for used oil management. These issues may have implications for service station dealers and others involved in DIY used oil recycling. This notice expanded and clarified a 1985 proposal regarding used oil. (The public comment period on the September notice ended November 7, 1991.)

The proposed management options are basic "housekeeping" guidelines designed to mitigate the effects of improper disposal, storage, and recycling of used oil. If promulgated, they would apply to all handlers of used oil, including generators, transporters, recyclers, marketers, burners, and disposal facilities. They would require used oil generators and collectors of DIY-generated used oil (e.g., service stations) to:

- Inspect for and clean up any spills or leaks associated with storage and transportation of recycled used oil.
- Keep records on the used oil's origin, transportation, and destination.
- Report all used oil recycling and disposal activities.

The 1985 notice proposed exempting small quantity generators (those who generate less than 300 gallons of used oil per month) from the most substantive of the management standards if they recycle used oil. The new proposal presented two potential alternatives for public comment. The first option would be to remove the distinction between large and small quantity generators. All generators would be treated equally as described above. This option would eliminate the need for measuring quantities of used oil collected and stored each month. It also would alleviate the concern that generators could be bumped into a more stringent regulatory category if they collect DIY-generated used oil. The result is essentially a system whereby *all* used oil is collected, recycled, and managed in an environmentally sound manner, thus reducing hazards to human health and the environment.



This first option also would exempt service station dealers from liability under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), or "Superfund," the federal law governing the cleanup of hazardous waste, if they comply with the management standards and accept DIY-generated used oil. This exemption could be beneficial to dealers because CERCLA liability can mean unexpected one-time costs for spill remediation, whereas the costs associated with the management standards are for preventive actions and therefore are more predictable and amenable to advance planning.

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## Focus on Corporate America

**I**n 1990, two major oil companies, Amoco Oil Company and Mobil Corporation, started pilot used oil collection programs at many of their service stations. Since their beginning, these programs have expanded greatly, providing Do-It-Yourselfers (DIYs) with convenient recycling depots in many communities across the nation. Both Amoco's and Mobil's used oil collection programs operate on three guiding principles: (1) DIYs can bring their used oil to any participating service station free of charge, (2) no purchase is necessary, and (3) both Amoco and Mobil service stations accept all used motor oil regardless of the brand. Moreover, station attendants bear responsibility for handling the used oil once it is brought in and for pouring it into receptacles for pickup. Both companies limit the amount of oil a person can return to 5 gallons per trip, and DIYs at Mobil must sign a register certifying that the oil they are recycling is not contaminated. Amoco and Mobil ask DIYs to deliver their used oil in clean plastic containers with caps (such as milk jugs or plastic oil bottles) for easy handling. The efforts of both Amoco Oil Company and Mobil Corporation show that effective management of DIY used oil is not only an important environmental goal, but increasingly a reality.

### Mobil-izing Recycling Forces



In October 1990, Mobil Corporation began its used oil acceptance program with a pilot program involving stations in Florida and metropolitan Washington, DC. A national advertising campaign helped spread the word about the pilot program. The campaign featured a 7-second spot at the end of the company's motor oil television commercials that strongly urged motorists to return their used oil at designated recovery sites.

According to Carl Gerster, Mobil Corporation spokesperson for the program, two concerns prompted Mobil to start the program. One, Mobil saw a chance to address a serious environmental problem in an inexpensive, but effective manner. Also, the corporation wanted to be proactive and show that private industry could solve a problem without further government regulations.

Gerster has been traveling throughout the United States promoting Mobil's used oil program in different regions of the nation. He conducts informative, educational sessions with independent dealers and provides technical assistance in establishing a collection system. Through these sessions, Mobil is striving to incorporate the used oil recycling program directly into its existing framework. Many full-service Mobil stations—those that provide comprehensive automobile service—already recycle used oil from car repairs and oil changes; the new program increases the amount of used oil gathered and turned over to state-licensed collectors. Gerster said that some service stations have reported 20 to 30 percent increases in the amount of used oil turned in per month since the program began.

Thus far there have been no incidents of used oil contamination, and overall, the program is running smoothly. The sole problem encountered by some Mobil dealers so far is the dropoff of oil after business hours when there are no attendants present. By the end of the third quarter of 1991, over 850 Mobil stations were accepting used oil for recycling.

Although the program is voluntary for independent Mobil dealers and distributors, most of them have welcomed the additional flow of potential customers represented by the participating DIYs. "It's a win-win situation: win for the environment and additional sales opportunities for the dealer," Gerster said. "We've had good success. The people bringing their oil in are happy to do it."

### Amoco Strives for Oil Recovery



Amoco Oil Company launched a pilot collection program in April 1990, that involved 34 full facility service stations in Illinois. Due to the success of the pilot at these service stations, the company extended the program to hundreds of more stations in Florida, as well as the metropolitan areas of Chicago, St. Louis, and Washington, DC/Baltimore, by the end of 1990.

In designing its used oil recycling program, Amoco was primarily motivated by a desire to provide consumers with a place to take used oil, according to Terri Mohsenzadeh, spokesperson for Amoco's program. "We wanted to show that a large corporation, without [government] regulations, can act and help solve this problem," Mohsenzadeh said. The collection program constitutes an important part of Amoco's company-wide environmental action policy.

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*A significant key to the overall success of used oil recycling programs is that consumers want to do the right thing environmentally.*

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Amoco currently has plans to expand its program, although details have not yet been announced. Although no exact figures are available on the amount of used oil collected, Mohsenzadeh asserted that the program's success is clearly demonstrated by the public praise and positive comment the company has received, as well as by the high participation rate of Amoco dealers. About 75 percent of independent Amoco dealers equipped with used oil storage tanks have chosen to undergo a brief training period and establish a collection site at their station. In addition, many states have invited the company to set up the collection program in their cities and towns.

Amoco reports only two incidents of contaminated oil, one of which was the fault of service station attendants. Most of the difficulties experienced by Amoco during the implementation process have come from complying with

# STATE CONTACTS ON USED OIL RECYCLING

The following list contains EPA's most recent directory of state used oil recycling contacts. Contacts, if your name, address, or phone number is incorrect or if there are others who should be included on the list, please inform Charles Franklin (OS-305), Office of Solid Waste, 401 M Street SW., Washington, DC 20460, (202) 260-4646.

(Updated July 30, 1991)

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Mr. Ken Hughes  
Integrated Waste Management Board  
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censing procedures, which in some states are more cumbersome than in others.

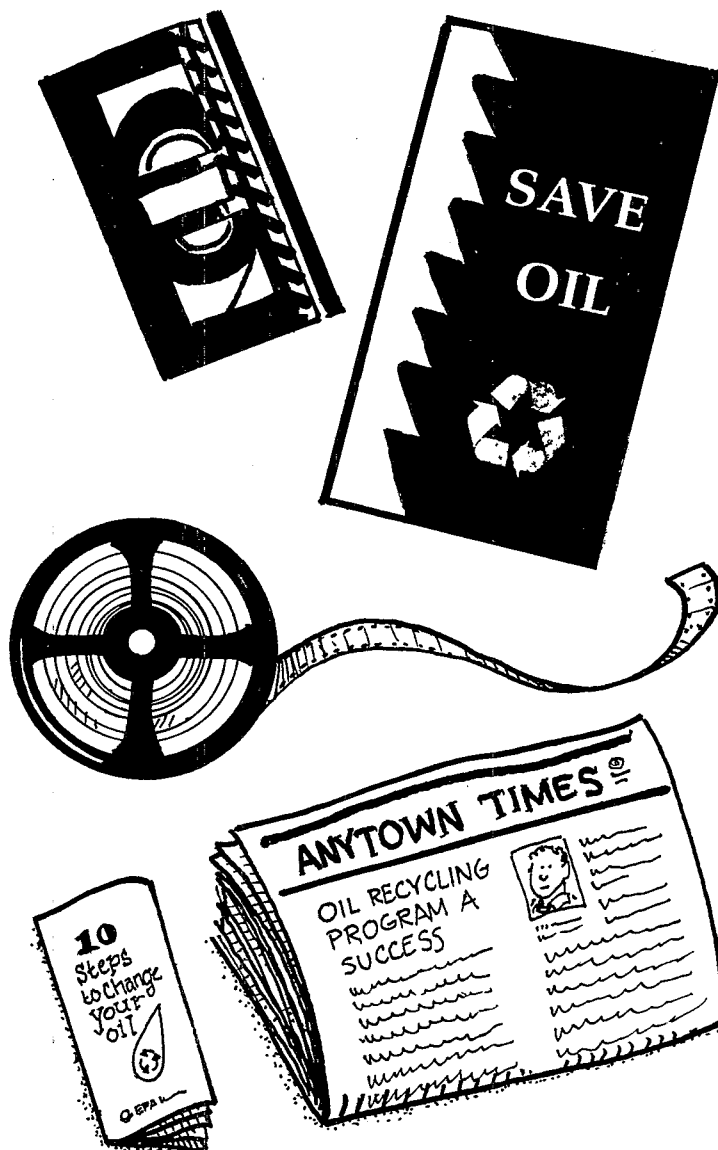
Mohsenzadeh points to the positive consumer response to the program as an indication that improper used oil disposal can be checked effectively. She believes that a significant key to the overall success of the program is that consumers want to do the right thing environmentally.

### Education + Publicity = Recycling

Both Amoco and Mobil have undertaken strong educational efforts to complement the collection component of their programs. These corporations believe that education is necessary to inform the public about the risks associated with improper oil disposal and instill environmentally sound disposal practices in individuals. In fact, the majority of costs incurred by Mobil and Amoco in implementing their used oil collection programs have stemmed from educational efforts.

Amoco has aired television public service announcements, printed pamphlets, and published full page newspaper ads in those areas where the Amoco collection program operates. In September 1991, Mobil plans to resume its television advertising campaign, which the company broadcast in 1990 at the start of its collection program. In addition, Mobil has published an "Environmental Awareness" brochure that explains the proper methods of used oil disposal.

Carl Gerster of Mobil Corporation remarked that, in Europe, returning used oil has become a standard practice for DIYs, while in the United States, only 10 percent of DIY used motor oil is properly collected and sent off for recycling. Gerster believes that a dynamic educational campaign and convenient collection locations are ways to make recycling a habit as it is in Europe and to address the problems of improperly managed used oil.



### Straight from the Crankcase



- Pennzoil Company sponsored the reprinting and distribution of over 20,000 copies of EPA's pamphlet, *Recycling Used Oil: 10 Steps to Change Your Oil* (EPA/530-SW-89-039C), to encourage used oil recycling efforts.
- AAA Potomac, a division of the American Automobile Association, distributed 1,200 copies of another EPA pamphlet, *Recycling Used Oil: What Can You Do?* (EPA/530-SW-89-039B), to AAA's seven service centers in the metropolitan Washington, DC, area in an effort to increase recycling of used oil generated by DIYs.
- In addition, EPA published a third pamphlet in the series, *Recycling Used Oil: For Service Stations and Other Vehicle-Service Facilities* (EPA/530-SW-89-039D), and a manual, *How to Set Up a Local Program to Recycle Used Oil* (EPA/530-SW-89-039A).

EPA encourages the copying and distribution of all the above publications. To obtain free copies, call EPA's RCRA/Superfund Hotline at (800) 424-9346 Monday through

Friday, 8:30 a.m. to 7:30 p.m. EST. For the hearing impaired, call TDD (800) 553-7672. Locally, call (703) 920-9810, or TDD (703) 486-3223. You may also write to: RCRA Information Center (OS-305), U.S. Environmental Protection Agency, 401 M Street, SW., Washington, DC 20460.

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The second option outlined in the recent proposal would be to use storage capacity as the distinguishing characteristic between small and large quantity generators. Under this second option, generators with total aboveground storage capacity of less than 1,320 gallons or underground storage capacity of less than 110 gallons would be considered small generators and exempt from the used oil management standards if they recycle the used oil they generate. Generators must document that they are recycling the oil on site or that they have a contract with a recycling firm. This option would allow small businesses to accumulate enough used oil to meet minimum requirements for pickup set by used oil collectors. It also would require less recordkeeping for small businesses and make determination of compliance easier for inspectors.

In addition to the options on alternative management standards, EPA presented new data that will be used in determining whether to list used oil as a hazardous waste. In 1986, EPA decided not to designate used oil that is being recycled as a hazardous waste due to the potential stigma that might be attached to a hazardous waste listing, which could discourage recycling and consequently result in increased incidences of improper disposal. In 1988, this decision was challenged, and a court ruling required EPA to base its listing determination solely on technical criteria.

In light of the new data in the notice, EPA presented three listing options for comment: listing all, some, or no used oils. *Regardless of the listing decision, DIY used oil collectors will not be liable under RCRA, because DIY used oil is a household waste and RCRA does not apply to this type of waste. In addition, regardless of the listing decision, EPA proposed that the management standards discussed in the notice apply to all used oils.* EPA's proposal was based on the view that all used oils can pose some degree of risk to human health and the environment when mismanaged, and thus need to be subject to some type of management standards, two options for which were presented in the notice.

For a copy of the September 23, 1991, *Federal Register* notice (docket number F-91-UOLP-FFFFF), call EPA's RCRA/Superfund Hotline at (800) 424-9346. For the hearing impaired, call TDD (800) 553-7672. Locally, call (703) 920-9810, or TDD (703) 486-3223. You may also write to:

RCRA Docket Information Center (OS-305)  
U.S. Environmental Protection Agency  
401 M Street, SW.  
Washington, DC 20460

Also, if you want to be included on the *Used Oil Recycling* mailing list, please write to the above address.

## EPA Promotes Used Oil Recycling

EPA's proposal also identified and requested comments on five possible approaches for promoting the collection and recycling of DIY-generated used oil and the maximum recycling of non-DIY used oil:

- Used oil generators and lube oil retailers may be required to accept DIY used oil for recycling and to post signs indicating that they accept this oil. They may also have to check DIY-generated oil for evidence of mixing and maintain collection containers in compliance with storage standards.
- Used oil recyclers and rerefiners may be required to collect DIY used oil through programs organized through the community or municipality, or with civic organizations. They may have to check the oil for evidence of mixing and keep records of annual quantities of DIY-generated oil accepted. They may also have to report the disposition of DIY-generated used oil.
- Oil producers may be required to recycle, or arrange for the recycling of, specific quantities of DIY used oil. They may have to register with EPA, report annually on whether projected recycling targets were met, and provide documentation to support compliance.
- Lube oil producers may have to meet a mandatory recycling ratio established annually by EPA. For example, producers could recycle the used oil themselves, purchase rerefined oil from rerefiners or processors, or purchase "used oil recycling credits" from rerefiners or processors at a price set by market forces. Each credit could equal a unit of used oil recycled; producers would need to acquire enough credits to meet the established recycling ratio.
- A system may be created in which customers would pay a deposit on certain quantities of oil purchased. The deposit could be redeemed when the used oil is returned for recycling.

EPA plans to analyze comments, study the above and other approaches, and then may propose one or more options for further public comment.

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